

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:**

**03-MDL-1570 (GBD)(SN)**

**TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001**

**IRAN NOTICE OF  
AMENDMENT**

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This document relates to:

*Susan M. King, et al. v. Islamic Republic of Iran*, No. 1:22-cv-05193-UA

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, as permitted and approved by the Court's Order of October 28, 2019, MDL ECF No. 5234. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, MDL ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in

connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), MDL ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (MDL ECF No. 2540).

### CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, MDL ECF No. 3237
- ☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>New Plaintiff's Name (alphabetical by last name)</b>	<b>New Plaintiff's State of Residency at Filing (or death)</b>	<b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
1.	Anthony Joshua Alvarado, individually, as surviving child of Anthony Alvarado	NY	United States	Anthony Alvarado	Child	ECF No. 1 ¶ 5, App. ¶ 99
2.	Lidia Alvarez, individually, as surviving parent of Juan Pablo Alvarez Cisneros	CA	United States	Juan Pablo Alvarez Cisneros	Parent	ECF No. 1 ¶ 5, App. ¶ 34
3.	Joan Bischoff, individually, as surviving parent of Lee Fehling	PA	United States	Lee Fehling	Parent	ECF No. 1 ¶ 5, App. ¶ 37
4.	Nicole Brathwaite-Dingle, individually, as surviving spouse of Jeffrey Dingle	TX	United States	Jeffrey Dingle	Spouse	ECF No. 1 ¶ 5, App. ¶ 59
5.	Jamie Brito, individually, as surviving child of Victoria Alvarez-Brito	NY	United States	Victoria Alvarez-Brito	Child	ECF No. 1 ¶ 5, App. ¶ 5
6.	Jamie Brito, as Personal Representative of the Estate of Mario Brito, deceased, the late spouse of Victoria Alvarez-Brito	NY	United States	Victoria Alvarez-Brito	Spouse (Deceased)	ECF No. 1 ¶ 5, App. ¶ 5

7.	Alfred R. Bucca, individually, as surviving sibling of Ronald P. Bucca	NY	United States	Ronald P. Bucca	Sibling	ECF No. 1 ¶ 5, App. ¶ 86
8.	Astrid Bucca, individually, as surviving sibling of Ronald P. Bucca	NY	United States	Ronald P. Bucca	Parent	ECF No. 1 ¶ 5, App. ¶ 86
9.	Eve Bucca, individually, as surviving spouse of Ronald P. Bucca	NY	United States	Ronald P. Bucca	Spouse	ECF No. 1 ¶ 5, App. ¶ 86
10.	Astrid Bucca, as Personal Representative of the Estate of Joseph Bucca, deceased, the late parent of Ronald P. Bucca	NY	United States	Ronald P. Bucca	Parent (Deceased)	ECF No. 1 ¶ 5, App. ¶ 86
11.	Robert Bucca, individually, as surviving sibling of Ronald P. Bucca	NY	United States	Ronald P. Bucca	Sibling	ECF No. 1 ¶ 5, App. ¶ 86
12.	Beverly Carlone, individually, as surviving spouse of David Carlone	CT	United States	David Carlone	Spouse	ECF No. 1 ¶ 5, App. ¶ 7
13.	Barbara Chucknick, individually, as surviving spouse of Steven Chucknick	NJ	United States	Steven Chucknick	Spouse	ECF No. 1 ¶ 5, App. ¶ 2
14.	Alfonso Cisneros, individually, as surviving parent of Juan Pablo Alvarez Cisneros	CA	United States	Juan Pablo Alvarez Cisneros	Parent	ECF No. 1 ¶ 5, App. ¶ 34
15.	Page Dantzler Dickerson, individually, as surviving spouse of Jerry Dickerson	AR	United States	Jerry Dickerson	Spouse	ECF No. 1 ¶ 5, App. ¶ 43
16.	Brian Duffy, individually, as surviving sibling of Christopher Duffy	NY	United States	Christopher Duffy	Sibling	ECF No. 1 ¶ 5, App. ¶ 71
17.	John G. Duffy, individually, as surviving parent of Christopher Duffy	NY	United States	Christopher Duffy	Parent	ECF No. 1 ¶ 5, App. ¶ 71

18.	Kevin Duffy, individually, as surviving sibling of Christopher Duffy	NY	United States	Christopher Duffy	Sibling	ECF No. 1 ¶ 5, App. ¶ 71
19.	James Fehling, individually, as surviving sibling of Lee Fehling	NY	United States	Lee Fehling	Sibling	ECF No. 1 ¶ 5, App. ¶ 37
20.	Thomas Fehling, individually, as surviving sibling of Lee Fehling	NY	United States	Lee Fehling	Sibling	ECF No. 1 ¶ 5, App. ¶ 37
21.	Danielle Fehling-Wasnieski, individually, as surviving spouse of Lee Fehling	NY	United States	Lee Fehling	Spouse	ECF No. 1 ¶ 5, App. ¶ 37
22.	Adriana Fiori, individually, as surviving child of Paul Fiori	CT	United States	Paul Fiori	Child	ECF No. 1 ¶ 5, App. ¶ 53
23.	Debbi Fiori, individually, as surviving child of Paul Fiori	CT	United States	Paul Fiori	Child	ECF No. 1 ¶ 5, App. ¶ 53
24.	Cynthia M. Gomes, individually, as surviving spouse of Dennis James Gomes	NC	United States	Dennis James Gomes	Spouse	ECF No. 1 ¶ 5, App. ¶ 63
25.	Gillian Gransauil-Joseph, individually, as surviving spouse of Stephen Joseph	AZ	United States	Stephen Joseph	Spouse	ECF No. 1 ¶ 5, App. ¶ 35

Dated: July 8, 2022

Respectfully submitted,

/s/ Jerry S. Goldman

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